

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

MARC S. CASON

PLAINTIFF,

CIVIL ACTION NO. PX-20-692

CORIZON HEALTH SERVICES, et al,
DEFENDANTS

PLAINTIFFS OPPOSITION TO DEFENDANT'S
MOTION TO DISMISS/MOTION FOR SUMMARY
JUDGEMENT ALTERNATIVE

FILED
10000
RECEIVED

AUG 07 2020

AT GREENBELT
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND

DEPUTY

1) STATEMENT OF FACTS

THE PLAINTIFF SUFFERED FROM APPROX. 7-14-2010 TO 7-17-2018
BEFORE ANYTHING WAS DONE ABOUT PROFUSE BLEEDING FROM HIS PENIS,
THE PLAINTIFF WAS SENT BACK AND FORTH TO GREATER BALTIMORE
WASHINGTON MEDICAL CENTER TO BON SECUR HOSPITAL ONLY TO BE SENT
BACK TO JESSUP REGIONAL INFIRMARY TO DORSEY RUN CORRECTIONAL
FACILITY AT LEAST THREE TIMES BEFORE THE BLADDER PROBLEM
WAS FINALLY RESOLVED IN LATE AUGUST (SEE MEDICAL RECORDS)
THIS VIOLATES THE (A. D. A.) AMERICANS WITH DISABILITIES
ACT.

THE PLAINTIFF WAS FORCED TO RE-USE CATHETERS. THE "2"
SIGN ON THE PACKAGE CONTAINING EACH CATHETER MEANS "DO NOT
RE-USE." IT ALSO CLEARLY STATES "DO NOT REUSE"

(2)

PLAINTIFF SUFFERED EXCRUCIATING PAIN FOR OVER A MONTH. PLAINTIFF HAD TO HAVE HIS BLADDER IRRIGATED AT LEAST 3 OR 4 TIMES WHICH IS HORRIBLY PAINFUL. I WAS HOSPITALIZED UNTIL SEP.

THE PLAINTIFFS CONDITION WAS NEGLECTED FROM JULY 1ST 2018 UNTIL AUGUST 18TH 2018 TO AUGUST 23RD 2020

THE PLAINTIFF COMPLAINED TO STAFF ONLY TO BE SENT BACK TO HIS DORMITORY. SICK CALL SLIPS SHOW PLAINTIFF COMPLAINING TO THIS DAY ABOUT BEING FORCED TO RE-USE CATHETERS.

AS OF THIS WRITING, PLAINTIFF IS STILL SUFFERING FROM U.T.I.'S BECAUSE OF CATHETER RE-USE. I HOPEFULLY, I WON'T GET AS SEVERE U.T.I. AND BLADDER INJURY FROM A BRITTLE USED CATHETER

THE MEDICAL RECORDS SPEAK FOR THE PLAINTIFF!
THE A.D.A. REQUIRES PROPER (ADEQUATE) MEDICAL CARE AND ADEQUATE MEDICAL SUPPLIES THIS WAS NOT DONE IN THE PLAINTIFFS CASE.

THE PLAINTIFF DOES NOT HAVE THE MEDICAL RECORDS FROM GBWMC (GREATER BALTIMORE, WASHINGTON MEDICAL CENTER) BUT THEY WOULD GREATLY SUPPORT THIS MOTION TO DENY SUMMARY JUDGMENT.

PAIN AND SIMPLE WEXFORD CORTZON, BON SECUR DE'S ^{ONABADO} BOLATTI, GETACHEN, SISAY, BISHAW AND SCIPIO ARE IN VIOLATION OF THE AMERICANS WITH DISABILITIES ACT AS WELL AS DELIBERATE INDIFFERENCE.

PROFUSE BLEEDING FROM THE PENIS, FEVER, PAIN, GROSS HEMATURIA, AND CYSTITIS IS A SERIOUS MEDICAL CONDITION. WHY DID I HAVE TO GO 3 DAYS BEFORE ANY TREATMENT? (SEE MEDICAL RECORDS ATTACHED)

(3)

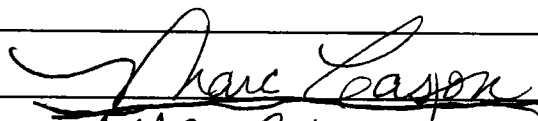
WHY DID IT TAKE OVER A MONTH TO FINALLY
RESOLVE THE PROBLEM?

THE PLAINTIFF RESPECTFULLY REQUESTS THAT
DR. LAURENCE H. SCIPIO, MD AND
BON SECOURS HOSPITAL BE ORDERED FOR
DEFAULT JUDGEMENT FOR NOT ANSWERING THE
COMPLAINT AGAINST THEM.

ALSO THAT THE MOTION TO DISMISS/MOTION FOR
SUMMARY JUDGEMENT BE DENIED!

IT IS THIS 24TH DAY OF JULY, 2020

RESPECTFULLY SUBMITTED,


MARC CASON
180571/160904